

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

*Ashton, et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN)  
*Parker, et al. v. Islamic Republic of Iran*, 18-cv-11416 (GBD)(SN)


DOROTHEA M. CAPONE, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the *Parker* Plaintiffs in the above-captioned litigation, and I submit this Declaration in support of the motion for final judgment filed by the *Parker* Plaintiffs identified in Exhibit A.
2. The source of my information and the basis for my belief in my statements contained herein are my personal involvement in this matter for more than 17 years, my firm's representation of the *Parker* Plaintiffs listed in Exhibit A in connection with the September 11th Terrorist Attacks litigation, direct communication with the personal representatives of the estates of decedents identified in Exhibit A, and other court records relating to the multi-district litigation to which the *Parker* Plaintiffs are parties. Any matters about which I lack personal knowledge are asserted herein upon information and belief.
3. Each of the decedents listed in Exhibit A died in the September 11, 2001 terror attacks.
4. The requested awards for the *Parker* Plaintiffs decedents' conscious pain and suffering set forth in Exhibit A are the same awards this Court has previously determined to be appropriate in this litigation.

5. The *Parker* Plaintiffs have not previously requested the within relief being sought here.

6. I respectfully request that this Court grant the proposed Order attached hereto as Exhibit B.

Dated: January 5, 2020  
New York, NY

  
Dorothea M. Capone